DEPARTMENT OF CONSERVATION DIVISION OF OIL AND GAS

4800 STOCKDALE HWY., SUITE #417 BAKERSFIELD, CALIFORNIA 93309 (805) 322-4031

July 9, 1987

Mr. L. E. Perrier TEXACO REFINING & MARKETING INC. 6451 Rosedale Highway Bakersfield, Ca. 93302

WATER DISPOSAL PROJECT Refinery Waste Water Fruitvale Field Main Area Etchegoin-Chanac Zone

Dear Mr. Perrier:

Subsequent to our letter of July 18, 1985, jurisdictional authority regarding UIC Class V wells has changed, prompting this clarification. As oilfield-related wells (located within an oilfield and completed in oilfield injection/producing zones), this Division retains jurisdictional responsibility for the mechanical integrity of the five wells operated by Texaco Refining & Marketing Inc. This would include annual mechanical integrity tests, maintenance of appropriate injection pressure limits, and any proposals to rework the wells.

With regards to "Red Ribbon" WDl, the State Regional Water Quality Control Board has issued Waste Discharge Requirements to you; therefore, our responsibility for mechanical integrity is shared, and the RWQCB is solely responsible for approval of the injection zone and the constituents in the injection stream. With regards to the remaining four wells, "Red Ribbon" 7 & 8, "KCL" 56-28, and "Water Injection Well" 2, there are no Waste Discharge Requirements at present. In the absence of any U. S. Environmental Protection Agency regulation, this Division is solely responsible for the operation of these four wells.

Any notices or proposals regarding the wells without Waste Discharge Requirements shall be addressed to this Division. Any limitations placed on "Red Ribbon" WDl by the RWQCB shall be considered applicable to all wells in your project.

Yours truly,

E. A. Welge Deputy Supervisor

Hal Bopp Senior Oil and Gas Engineer

cc: EPA RWQCB

EAW/HB/njk